

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BRITTNEY ROBOTHAM

Plaintiff,

v.

**HEALTHCARE REVENUE
RECOVERY GROUP, LLC**

Defendant.

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Case No. 4:20-cv-00653-RLW

JOINT PROPOSED SCHEDULING PLAN

COME NOW the parties, by and through their attorneys, and file their Joint Proposed Scheduling Plan:

- (a) The parties agree that Track 2 is appropriate.
- (b) The cut-off date for joinder of additional parties and amendment of the pleadings will be no later than **October 19, 2020**.
- (c) The parties propose the following scheduling plan:
 - (i) The parties shall make all disclosures required by Rule 26(a)(1) no later than **August 14, 2020**.
 - (ii) Discovery does not need to be conducted in phases or limited to certain issues.
 - (iii) Plaintiff shall designate all testifying experts and disclose their reports by **November 9, 2020** and present them for deposition by **November 23, 2020**. Defendants shall designate all testifying experts and disclose their reports by **December 7, 2020** and present them for deposition by **December 21, 2020**.

(iv) The presumptive limits of ten (10) depositions per side and twenty-five (25) interrogatories per party shall apply.

(v) It is not anticipated that a physical and/or mental examination will be requested pursuant to Rule 33 Fed. R. Civ. P.

(vi) All discovery herein shall be completed no later than **January 29, 2021**.

(vii) The parties are aware of no other matters pertinent to the completion of discovery in this case.

(d) The parties believe that mediation or other alternate dispute resolution would be appropriate and effective, and the deadline to complete mediation or ADR ought to be **January 5, 2021**.

(e) Any motions to dismiss, for summary judgment, or motions for judgment on the pleadings must be served and filed as required no later than **March 5, 2021**.

(f) The earliest date by which this cause should reasonably be expected to be ready for trial is **June 7, 2021**.

(g) The estimated length of trial will be **two to three** (2–3) days.

The undersigned hereby certify that a copy of the above has been circulated and discussed and stipulated to by all counsel of record.

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